

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America
v.

Jeffrey Robert NEAL

Case: 2:23-mj-30286

Assigned To : Unassigned

Assign. Date : 7/12/2023

CMP: USA v Neal (MAW)

CRIMINAL COMPLAINT

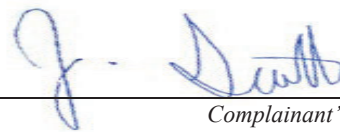
I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 9, 2023 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:*Code Section**Offense Description*

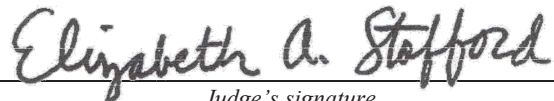
18 U.S.C. 922(g)

Felon in possession of a firearm

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.Sworn to before me and signed in my presence
and/or by reliable electronic means.Date: July 12, 2023City and state: Detroit, Michigan*Complainant's signature*

Task Force Officer Joshua Scott - ATF

Printed name and title*Judge's signature*

Honorable Elizabeth Stafford, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, Joshua Scott, being duly sworn, depose and state the following:

I. INTRODUCTION

1. I am a Task Force Officer “TFO” with the Detroit Police Department and the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”), and have been since February 2020. I am an “investigative or law enforcement officer of the United States” within the meaning of Title 18, United States Code, Section 2510(7), and I am empowered by law to conduct investigations and make arrests of offenses enumerated under federal law. I have received extensive training at and successfully graduated from the Detroit Police Training Academy as a Police Officer. I have worked patrol for 2 years including a year of routine patrol and a year in the 5th precinct special operations unit. During my time in law enforcement, I have participated in numerous criminal investigations, involving firearms crimes, armed drug tracking violations, and offenses by criminal street gangs, among others.

2. I make this affidavit from my personal knowledge based on my participation in this investigation, including interviews conducted by myself or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, review of reports by myself and/or other law enforcement agents, and information gained through my training and

experience. The information outlined below is provided for the limited purpose of establishing probable cause and does include all the information known to law enforcement related to this investigation.

3. ATF is currently conducting a criminal investigation concerning Jeffrey Robert NEAL (DOB: XX/XX/1988) for violating 18 U.S.C. § 922(g)(1) as a felon in possession of a firearm.

II. PROBABLE CAUSE

4. I reviewed records related to NEAL's criminal history and learned the following:

- a. On March 13, 2008, NEAL was charged with armed robbery, felony firearm, and carrying a concealed weapon in Wayne County's Third Circuit Court. NEAL pleaded guilty to armed robbery and felony firearm. On June 18, 2008, he was sentenced to 1–15 years' incarceration for armed robbery and 2 years' incarceration for felony firearm. NEAL was released from the department of corrections on March 10, 2011;
- b. Based on my training and experience, defendants are warned of the maximum penalty when they enter a plea of guilty to a felony. Additionally, based on the significant amount of time NEAL spent in prison as a result of his felony convictions, there

is probable cause to believe that NEAL is aware of his status as a convicted felon.

5. On July 9, 2023, at approximately 9:33 p.m., three Detroit Police officers were working in downtown Detroit, near the corner of Beaubien Street and Macomb Street. One of the officers saw Jeffrey NEAL walking to a parking lot near that intersection. While walking towards the lot, NEAL told another person walking down the street not to go to Delmar's club and to walk the other way.

6. Moments later, the officers observed NEAL pull his white suburban up to Beaubien Street, near where the officers were standing. One of the officers observed NEAL to be agitated and heard him yelling. The officers observed a female ("A.C.") walking down Beaubien, towards NEAL's suburban, yelling about NEAL having access to a firearm. One officer observed NEAL, inside the suburban, lean forward and make a pulling motion consistent with someone removing a firearm from their person.

7. The officers promptly walked over to NEAL's suburban. As the officers got closer, NEAL stepped out of the driver's seat. The officers temporarily detained NEAL. A.C. attempted to get into the driver's seat of NEAL's vehicle, but the officers immediately removed her from the vehicle.

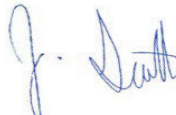
8. An officer looked inside the vehicle through the open driver door and observed a firearm in the center console, in front of the cup holder. The officer

seized the firearm, a loaded Smith & Wesson M&P 40 Shield handgun. The officer searched the car and recovered a second firearm, a loaded Sig Sauer P320 9mm handgun sitting on the front passenger seat.

9. On July 11, 2023, I contacted ATF Interstate Nexus Expert, Special Agent Kevin Rambus, and provided information about the Smith & Wesson M&P 40 Shield handgun and the Sig Sauer P320 9mm handgun. SA Rambus concluded that both firearms were manufactured outside the State of Michigan and are firearms as defined in Title 18 U.S.C., Chapter 44, Section 921(a)(3).

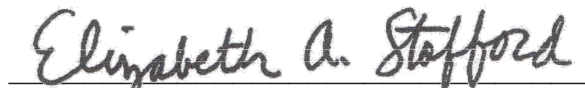
III. CONCLUSION

10. Probable cause exists to believe that Jeffrey Robert NEAL knowingly possessed a firearm after having been convicted of a felony offense in violation of Title 18 U.S.C. Section 922(g)(1). This violation occurring within the Eastern District of Michigan.



Joshua Scott, Task Force Officer
Bureau of Alcohol, Tobacco, Firearms and
Explosives

Sworn to before me and signed in my presence
And/or by reliable electronic means



Honorable Elizabeth Stafford
United States Magistrate Judge

Dated: July 12, 2023